

Maria A. Bourn
Anthony Tartaglio
GOMERMAN | BOURN & ASSOCIATES
825 Van Ness Ave, Suite 502
San Francisco, CA 94109
Telephone: (415) 545-8608
Email: maria@gobolaw.com
tony@gobolaw.com

Attorneys for Plaintiff
NEELAM SANDHU

KATHERINE M. FORSTER (State Bar No.
217609)
Katherine.Forster@mto.com
CRAIG JENNINGS LAVOIE (State Bar No.
293079)
Craig.Lavoie@mto.com
LAUREN N. BECK (State Bar No. 343375)
Lauren.Beck@mto.com
KYRA E. SCHOONOVER (State Bar No.
343166)
Kyra.Schoonover@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Attorneys for Defendant BLACKBERRY
CORPORATION

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

NEELAM SANDHU, an individual,

Plaintiff,

vs.

BLACKBERRY CORPORATION, a
Delaware Corporation,

Defendants.

Case No.: 3:24-cv-02002-SK

**JOINT STIPULATION TO MODIFY THE
CURRENT ADR DEADLINES AND ORDER**

Judge: Hon. Sallie Kim

Pursuant to Civil Local Rules 6-2 and 7-12, Defendant BlackBerry Corporation (Defendant) and Plaintiff Neelam Sandhu (Plaintiff) (together, the “Parties”), by and through their respective counsel of record, jointly stipulate and agree, subject to the Court’s approval, to amend the case deadlines applicable in the above-captioned case:

WHEREAS, on January 21, 2025, Plaintiff’s counsel attended a pre-mediation call with the court-appointed mediator, Jean Hyams;

WHEREAS, on January 23, 2025, Defendant’s counsel attended a pre-mediation call with Ms. Hyams;

WHEREAS, the Parties agree that mediation will be more productive after additional discovery has been completed in this action;

WHEREAS, to date, the Parties have not commenced taking depositions or completed their respective document productions;

WHEREAS, to allow the Parties time to complete more discovery before mediation, the Parties agree and respectfully request that the Court modify the case schedule as follows:

Event	Current Date	Proposed Date
Mediation Hearing	February 26, 2025	TBD
ADR Deadline	March 10, 2025	July 7, 2025

NOW, THEREFORE, the Parties, subject to the Court’s approval, hereby stipulate, agree, and respectfully request that the Court enter the schedule proposed above.

IT IS SO STIPULATED.

Dated: February 18, 2025

GOMERMAN | BOURN & ASSOCIATES

By: /s/ Anthony Tartaglio
Maria Bourn
Anthony Tartaglio
Attorneys for Plaintiff
NEELAM SANDHU

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2 Dated: February 18, 2025

MUNGER, TOLLES & OLSON LLP

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5 By: /s/ Katherine M. Forster
6 KATHERINE M. FORSTER
7 Attorneys for Defendant
8 BLACKBERRY CORPORATION
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Order

Pursuant to the parties' stipulation, the Court HEREBY extends the parties' deadline to participate in alternative dispute resolution from March 10, 2025 to July 7, 2025. The parties must work directly with the mediator to reschedule the mediation date.

IT IS SO ORDERED.

DATED: February 18, 2025



HONORABLE SALLIE KIM
UNITED STATES MAGISTRATE JUDGE

CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), the filer of this document attests that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: February 18, 2025

By: /s/ Katherine M. Forster
Katherine M. Forster